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23 UNITED STATES DISTRICT COURT
24 NORTHERN DISTRICT OF CALIFORNIA
25 OAKLAND DIVISION

26 DREW KLAUSNER;

27 Plaintiff,

28 v.

INDUSTRIAL LIGHT AND MAGIC, a
division of LUCASFILM ENTERTAINMENT
COMPANY LTD. and DOES 1 through 25,
inclusive,

Defendants.

Case No. CV 09-03502-CW

STIPULATION EXTENDING DEADLINE
TO FILE MOTIONS TO COMPEL FACT
DISCOVERY & ORDER

[Civ. L.R. 6-2, 37-2]

Action Filed: July 30, 2009
Trial Date: April 11, 2011



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STIPULATION OF THE PARTIES

WHEREAS, the deadline to complete fact discovery in this action was continued to July 31, 2010, and the deadline to file motions to compel fact discovery is currently August 9, 2010, pursuant to Civil Local Rule 37-2 and Federal Rule of Civil Procedure 6;

WHEREAS, the Parties wish to have additional time to meet and confer about fact discovery in an attempt to informally resolve all issues between them without filing motions to compel;

THEREFORE, pursuant to Civil Local Rule 6-2, the Parties to this action, by and through their counsel of record, hereby stipulate and request the Court to order that the deadline to file any motions to compel fact discovery is extended to and including September 30, 2010.

IT IS SO STIPULATED.

DATED: August 5, 2010

MARGOLIS & TISMAN LLP

By: /s/ Naki M. Irvin
NAKI M. IRVIN

Attorneys for Defendant
INDUSTRIAL LIGHT AND MAGIC, a
division of LUCASFILM ENTERTAINMENT
COMPANY LTD.

DATED: August 5, 2010

PIERCE & SHEARER LLP

By: /s/ Stacy Y. North
STACY Y. NORTH
Attorneys for Plaintiff
DREW KLAUSNER

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: 8/12/2010


HON. CLAUDIA WILKEN
United States District Court Judge

DECLARATION OF NAKI M. IRVIN

I, Naki M. Irvin, declare as follows:

1. I have personal knowledge of the facts set forth below.

2. I am a partner with Margolis & Tisman LLP, which is counsel of record in this action for Defendant Industrial Light & Magic, a division of Lucasfilm Entertainment Company Ltd. Pursuant to Civil Local Rule 6-2(a), I make this declaration to accompany the stipulated request to extend the deadline to move to compel fact discovery.

3. The reason for this stipulated request is that the Parties wish to have additional time to meet and confer about fact discovery in an attempt to informally resolve all issues between them without filing motions to compel.

4. The only previous time modifications in this case have been stipulated extensions of fact and expert discovery deadlines.

5. The requested time modification will not delay the trial, which is not scheduled to begin until April 11, 2010, or otherwise affect the schedule for this case.

I declare, under penalty of perjury, under the laws of the United States, that the foregoing is true and correct, and that this declaration was executed this 5th day of August, 2010, at San Francisco, California.

/s/ Naki M. Irvin
NAKI M. IRVIN